

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION  
CASE No. 4:08-CV-0031-DFH-WGH**

**KAREN DEATON,** )  
  
                  **PLAINTIFF,** )  
  
**V.** )  
  
**MULTI-COLOR CORPORATION,** )  
**ET AL.** )  
  
                  **DEFENDANTS.**

**DEFENDANTS' PRELIMINARY WITNESS AND EXHIBIT LIST**

Defendants, Multi-Color Corporation and Guardian Life Insurance Company of America, by counsel, make the following Preliminary Witness and Exhibit identification:

**Preliminary Witness List**

As stated in their Rule 26 Initial Disclosures and the Case Management Order, Defendants object to discovery beyond the administrative claim documents. In the event the Court determines discovery beyond the administrative record is required, Defendants will identify their anticipated witnesses.

**Preliminary Exhibit List**

1. Plaintiff's payroll records from 2003 through her last day of employment in October 2007
2. 2004 Benefits Rate Sheet
3. 2005 Rate Sheet for Voluntary Life Insurance
4. 2006 Benefits Rate Sheet
5. A blank 2006 Benefits Enrollment Form
6. A blank 2005 Benefits Enrollment Form

7. Evidence of Insurability Form completed by Karen Deaton on February 8, 2007
8. Various correspondence to Karen Deaton from Guardian
9. 2007 Benefits Enrollment Form signed by Karen Deaton
10. Group Life Claim Form signed by Karen Deaton on March 19, 2007
11. Scott County Health Department Certificate of Death
12. Various correspondence regarding dependent life claim
13. 2004 Benefits Enrollment/Change Form signed by Karen Deaton in December 2003
14. Your spectrum of benefits 2007
15. Overview of Benefits
16. Copy of Multi-Color Group Insurance Plan
17. Guardian Underwriting File

Respectfully submitted,

/s/ V. Brandon McGrath

V. Brandon McGrath ([vbm@gdm.com](mailto:vbm@gdm.com))

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Attorneys for Defendants Multi-Color Corporation  
and The Guardian Life Insurance Company of America

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of August, 2008, a copy of the foregoing was served upon the following via regular U.S. Mail, postage prepaid:

Michael M. Maschmeyer  
426 E. Court Avenue  
Jeffersonville, IN 47130

/s/ V. Brandon McGrath  
Attorney for Defendant

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